

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

**Illinois Department of Commerce and
Economic Opportunity**

**Approval of Energy Efficiency and
Demand Response Plan**

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Docket No. 07-0541

**STAFF OF THE ILLINOIS COMMERCE COMMISSION PREHEARING
MEMORANDUM**

Pursuant to the request made by the Administrative Law Judge at the status hearing held on November 20, 2007, the Staff of the Illinois Commerce Commission ("Staff"), by and through its attorneys, hereby submits its Prehearing Memorandum in the above captioned matter with regard to the energy efficiency and demand response plans submitted by Illinois Department of Commerce and Economic Opportunity ("DCEO").

Staff through its testimony has addressed and or will address in its brief the following issues:

1. Address whether DCEO coordinated efforts with the Department of Healthcare and Family services.
2. Address whether DCEO's plan implements new building and appliance standards.
3. Address whether DCEO's plan provides opportunities for a diverse cross-section of customers of all rate classes.
4. Address whether DCEO's plan budgets no more than 3% of program revenues to breakthrough equipment and devices.

5. Address whether DCEO should be allowed flexibility to modify programs as necessary to meet portfolio load reduction goals.
6. Address whether DCEO should update spending limits during the life of the plans.
7. Address whether energy efficiency and demand response measures energy savings should be annualized.
8. Address whether DCEO's plan's measures are cost effective
9. Address whether DCEO's plan provides for an adequate annual independent evaluation of the plans performance.
10. Address whether DCEO's proposal to use deemed values to evaluate the plan should be adopted by the Commission.
11. Address whether the Commission should approve a stakeholder process to address measurement and verification of savings for energy efficiency measures.
12. Address whether savings should be based upon actual usage or previously forecasted usage.
13. Address whether DCEO should be allowed to bank excess energy savings for the next plan year.
14. Address whether Staff should conduct workshops to solicit comments from interested stakeholders about the attributes of and appropriate procedural vehicle for developing an effective regulatory framework for a demand side portfolio as proposed by the Natural Resources Defense Council.

Respectfully submitted,

/s/

JOHN C. FEELEY
CARMEN L. FOSCO
ARSHIA JAVAHERIAN
Office of General Counsel
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601
Phone: (312) 793-2877
Fax: (312) 793-1556
jfeeley@icc.illinois.gov
cfosco@icc.illinois.gov
javahera@icc.illinois.gov

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*Counsel for the Staff of the
Illinois Commerce Commission*